

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10245-RGS
)	
ANDREW PERRY)	

JOINT MOTION TO EXCLUDE TIME

The parties hereby move, pursuant to 18 U.S.C. § 3161(h)(8)(A), to exclude the period of time commencing on April 14, 2005 and ending on May 5, 2005. It is expected that the requested extension will allow the parties additional time to negotiate a plea.

WHEREFORE, both parties respectfully request that under 18 U.S.C. § 3161(h)(8)(A) this Court find, based on the above, that the ends of justice served by granting the requested exclusion outweigh the best interests of the public and the defendant in a speedy trial, and accordingly exclude the above period in computing the time within which trial must commence under 18 U.S.C. § 3161.

Respectfully submitted,

MICHAEL SULLIVAN
UNITED STATES ATTORNEY

ANDREW PERRY
By His Attorney,

/s/ Timothy Watkins o/b/o
William H. Connolly
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